

TBS

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

08 SEP -2 AM 9:51

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)

Magistrate Case Number: _____

Plaintiff,)

COMPLAINT FOR VIOLATION OF

v.)

Title 21, U.S.C., Sections 952 and 960
Importation of a Controlled Substance

ROMERO Rodelo, Jose Jesus)

Defendant,)

'08 MJ 2672

The undersigned complaint being duly sworn states:

On or about September 1, 2008, within the Southern District of California, Jose Jesus ROMERO Rodelo, did knowingly and intentionally import approximately 9.20 kilograms of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Barqueline Cannon
SIGNATURE OF COMPLAINANT
SPECIAL AGENT
U.S. IMMIGRATION and
CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 2nd DAY OF September, 2008.

[Signature]
MAGISTRATE JUDGE

DOA 09/01/08 gje

STATEMENT OF FACTS

At approximately 1050 hours on September 1, 2008, Jose Jesus ROMERO Rodelo entered the United States from the Republic of Mexico via the Otay Mesa, California, Port of Entry in a Ford 150 pick-up truck bearing Baja California license plates AM23460. ROMERO was the driver and sole occupant of the vehicle at the time he entered the United States. ROMERO gave two negative declarations and told Customs and Border Protection Officer (CBPO) Ed Olaes that he was going to junkyard and that the truck belonged to his brother.

Canine Enforcement Officer (CEO) Charles Petrach utilized his Narcotic/Human Detection Dog, "Kazan", to screen the vehicle driven by ROMERO. "Kazan" alerted to a narcotic odor exuding from the bed of the truck.

An inspection of the vehicle resulted in the discovery of 15 packages of a white crystalline substance concealed inside the quarter panels of the vehicle. A random sample of one of the packages field-tested positive for the presence of methamphetamine. The total weight of the packages containing methamphetamine was approximately 9.20 kilograms.

Immigration and Customs Enforcement Special Agents (SA) Jacqueline Cannon and San Diego Police Officer Esmeralda Tagaban interviewed ROMERO. After being advised of his Miranda rights, which he waived, ROMERO admitted knowledge of the methamphetamine concealed in the quarter panels. ROMERO stated he was going to be paid \$1000 USD to deliver the vehicle to the junkyard in San Diego, CA.